

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MEGHAN ABBOTT,

Plaintiff,

v.

WELSPUN INDIA LTD., and WELSPUN USA INC.,

Defendants.

Case No. 1:16-cv-06792-RJS-DCF

ECF Case

CLASS ACTION

NOTICE OF JOINT APPLICATION OF HAGENS BERMAN AND STECKLER GRESHAM COCHRAN PLLC TO BE APPOINTED INTERIM CO-LEAD COUNSEL

PLEASE TAKE NOTICE that Plaintiffs Meghan Abbott, Ursula Keep, Elise Aasgaard, Nicole Jauer Reynolds, and Michelle Blair (collectively “Abbott Plaintiffs”) move for appointment of Hagens Berman Sobol Shapiro LLP and Steckler Gresham Cochran PLLC as interim co-lead counsel for the putative class (collectively “Interim Co-Lead Counsel”), and McCune Wright LLP and The Paynter Law Firm as members of the Plaintiffs’ Executive Committee (“PEC”).

This Application is based on this Notice of Joint Application, the Joint Application to Appoint Hagens Berman and Steckler Gresham Cochran PLLC as Interim Co-Lead Counsel, the Declaration of Robert B. Carey in Support of Joint Application of Hagens Berman’s and Steckler Gresham Cohran PLLC to be Appointed Interim Co-Lead Counsel, the Declaration of Bruce Steckler W. Steckler in Support of Joint Application of Hagens Berman’s and Steckler Gresham Cohran PLLC to be Appointed Interim Co-Lead Counsel, the pleadings on file in this action, oral argument and such other matters as the Court may consider in these actions.

Dated: December 9, 2016.

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: s/ Robert B. Carey

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Dated: December 9, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2016, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

s/ Robert B. Carey
ROBERT B. CAREY